UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BLVD
CHICAGO, IL 60604

MEMORANDUM 01 SEP 2011

DATE:

SUBJECT: Request for Approval and Funding for a Time-Critical Removal Action at the Blissfield Cannery Site, Blissfield, Lenawee County, Michigan (Site ID # B5ZN)

FROM: Jon J. Gulch, OSC
Emergency Response Branch 1, Section 2

THRU: Jason H. El-Zein, Chief
Emergency Response Branch I

TO: Richard C. Karl, Director
Superfund Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document your approval to expend up to $283,309 to conduct a time-critical removal action at the Blissfield Cannery Site located in Blissfield, Lenawee County, Michigan. The proposed time-critical removal action herein will mitigate the threats from small containers and drums of corrosive liquids, flammable liquids, and laboratory chemicals and contaminated soils by properly identifying, consolidating, packaging, and removal for off-site treatment and disposal. There are no nationally significant or precedent setting issues associated with the proposed response at this non-NPL site.

The Action Memorandum would serve as approval for expenditures by the U.S. EPA (EPA), as the lead technical agency, to take actions described herein to abate the imminent and substantial endangerment posed by hazardous substances at the Site. The proposed removal of hazardous substances would be taken pursuant to Section 104(a)(1) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 USC 9604(a)(1), and Section 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR 300.415.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID: MIN000510525
State ID: none

RCRA: NA
Category: Proposed Time-Critical Removal

The Site contained a gasoline service station operated on the northern portion of the Site from 1916 until circa 1980s. In 1930, a building was constructed east of the gasoline station to manufacture septic tanks. Before 1963, an automotive repair facility operated in this building. No information is available on when the repair facility closed. Between 1981 and 1982, L&L Sandblasting occupied a portion of this building. Beginning in 1924 and continuing until circa 1990, the Home Canning Company conducted operations in the two larger on-site buildings. Operations included the processing and canning of tomatoes and pumpkins. Process wastewater from cannery operations was disposed of into four on-site retention ponds. From 2000 until 2010, antiques, used farm, and used industrial equipment were stored and sold at the Site. On June 25, 2010, the Village of Blissfield acquired the property parcels at an auction and intends to hold the Property for future redevelopment.

Currently, the Site is an unattended and condemned, industrial building containing corrosive liquids, flammable liquids, and laboratory chemicals all located within close proximity to each other without proper secondary containment. In addition, there are contaminated soils that present a direct contact hazard.

A. Site Description

1. Removal site evaluation

On May 17, 2011, the EPA On-Scene Coordinator (OSC) and the Superfund Technical Assistance and Response Team (START) mobilized to the Site. After a brief safety meeting and equipment set-up, EPA and START personnel walked throughout the Site to perform air monitoring, collect and consolidate small containers into one of two locations, and identify containers and locations from which to collect liquid and soil samples.

During the site reconnaissance, written and photographic documentation of current Site conditions was collected and potential environmental threats and sampling locations were noted. Open drums with little or no labeling were observed throughout the facility. Initial air and radiation monitoring indicated no elevated readings in the breathing zone. Various containers throughout the facility were designated for sample collection. A total of 8 liquid and 3 soil samples were collected and transported to TriMatrix Laboratory in Grand Rapids, Michigan. Overall sampling parameters included analysis for the following: Toxicity Characteristic Leaching Procedure (TCLP) metals, TCLP VOCs, TCLP semi-volatile organic compounds (SVOC), total metals, total cyanide, flashpoint, and pH.

Soil sample results were compared to the Michigan Department of Environmental Quality (MDEQ) Non-Residential Soil Direct Contact criteria and criteria in Title 40 of the *Code of Federal Regulations* (CFR), Part 261.2. Liquid sample analytical results also

were compared to criteria in 40 CFR 261.2. According to 40 CFR, Part 261.2, a solid waste is considered a hazardous waste if it exhibits any of the characteristics of ignitability, corrosivity, toxicity, or reactivity. The sample analytical results are summarized below.

- **TCLP Metals:** Liquid sample BC-WL08-051711 contained chromium at 450 milligrams per liter (mg/L), which exceeds the 40 CFR 261.2 criterion for chromium of 5 mg/L. Therefore, this sample represents a hazardous waste by virtue of the characteristic of toxicity.
- **TCLP VOCs:** Liquid sample BC-WL06-051711 contained 1,4-dichlorobenzene at 220,000 mg/L, which exceeds the 40 CFR 261.2 criterion for 1,4-dichlorobenzene of 7.5 mg/L. In addition, sample BC-WL06-051711 also contained chlorobenzene at 2,900 mg/L, which exceeds the 40 CFR 261.2 criterion of 100 mg/L. Therefore, this sample represents a hazardous waste by virtue of the characteristic of toxicity.
- **Corrosivity:** Liquid sample BC-WL08-051711 exhibited a pH of less than 2 standard units (SU). Liquid samples BC-WL01-051711, BC-WL02-051711, BC-WL03-051711, BC-WL04-051711, and BC-WL07-051711 exhibited pH levels exceeding 12.5 SUs. Because of the highly hazardous nature of some of the waste liquid samples, the laboratory was unable to use its pH instruments without damaging the electrodes. Therefore, the above samples were analyzed using pH paper, and results are reported in a less than or greater than format. All the samples discussed above represent hazardous wastes by virtue of the characteristic of corrosivity.
- **Total Metals:** Soil sample BC-SS02-051711 contained total arsenic at 69 milligrams per kilogram (mg/kg), which exceeds the MDEQ Part 201 Non-Residential Soil Direct Contact criterion for arsenic of 37 mg/kg. Therefore, this soil associated with this sample represents a direct-contact risk.

2. Physical location

The Site is located at 440 East Jefferson Street in Blissfield, Lenawee County, Michigan 49228 (Figure 1). The Site is bordered to the north by U.S. Route 223 (Adrian Street) and East Jefferson Street, with commercial properties beyond; to the south by open farmland; to the east by a Penn Central Rail line, with commercial and industrial properties beyond; and to the west by residential properties. The geographic coordinates of the Site are 41°49'39.01" North latitude and 83°51'08.30" West longitude.

The Site consists of six contiguous parcels of land totaling approximately 35 acres. The northern portion of the Site contains two former cannery buildings measuring 19,600 and 32,822 square feet; and a former gasoline service station/automotive repair building measuring 1,876 square feet (Figure 2). These buildings are in various states of disrepair and have collapsed roofs and exterior walls as well as missing entry doors. Except for retention ponds south of the former cannery buildings, the remainder of the Site is grass-covered land formerly used for agricultural purposes.

The area surrounding the Blissfield Cannery Site was screened for Environmental Justice (EJ) concerns using Region 5's EJ assist Tool (which applies the interim version of the national EJ strategic Enforcement Assessment Tool (EJSEAT)). Census tracts with a score of 1, 2, or 3 are considered to be high-priority potential EJ areas of concern according to EPA Region 5. The Blissfield Cannery Site is in a census tract with a score of 8. Therefore, Region 5 does not consider this to be a high-priority potential EJ area of concern. Please refer to the attached EJ analysis for additional information (Attachment 1).

3. Site characteristics

The Home Canning Company operated as a canning facility until the building was abandoned in the 1990's. From the 1990's through 2010, several operations were conducted in the vacant buildings where various chemicals were abandoned. The second building was used as an automotive service station. The facility is currently unattended and is in deteriorated condition.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

The threat is presented by the presence, in an unattended industrial building, of: highly corrosive liquids, flammable liquids, and laboratory chemicals all located within close proximity to each other without proper secondary containment, in a building of poor integrity.

5. NPL status

The Blissfield Cannery Site is not on the National Priorities List.

6. Maps, pictures and other graphic representations

Figure-1 Site Location Map, Figure-2 Facility Diagram, and Figure-3 Photo Log are included as attachments.

B. Other Actions to Date

1. Previous actions

EPA and START have taken the actions discussed above. The Village of Blissfield purchased the property on June 25, 2010. Prior to that date, Lenawee County funded, inter alia, a Phase I Environmental Assessment for the Site. Soils and Materials Engineers Inc. (SME) completed the Phase I Environmental Assessment in a report dated June 23, 2010. The purpose of the Phase I Environmental Assessment was to satisfy the "all appropriate inquiry" (AAI) requirements of CERCLA to allow the Village to become a Bona Fide Prospective Purchaser (BFPP) in accordance with Section 101(40) of CERCLA, 42 U.S.C. § 9601(40). Lenawee County funded the Phase I assessment using

monies from a hazardous substances assessment grant (which was funded by the by the American Recovery and Reinvestment Act). SME's Phase I Environmental Assessment notes the presence of the drums and containers within the buildings. However, SME stated that it could not safely enter the buildings because of the lack of the structural integrity of the buildings and, therefore, SME did not sample any of the drums and containers within the buildings. To date, EPA is unaware of any other actions taken at the Site.

2. Current actions

SME is currently developing a "due care" plan for Site (also funded by Lenawee County with monies from the American Recovery and Reinvestment Act). The Village of Blissfield intends to demolish the buildings.

C. State and Local Authorities' Roles

1. State and local actions to date

Other than the actions described above, SME has also conducted a Phase II Environmental Assessment and a Baseline Environmental Assessment (also funded by Lenawee County with monies from the American Recovery and Reinvestment Act).

2. Potential for continued State/local response

The Village of Blissfield has a population of approximately 3,200 and the average household income is significantly below the national average. The Village of Blissfield could apply for a grant from the EPA for funds to address the abandoned drums and containers within the buildings. Such a grant application would face national competition with other applicants for grant funds. If the Village of Blissfield were to receive grant funds to address the drums and containers, the earliest the monies would be disbursed by EPA would be October 2012.

III. THREATS TO PUBLIC HEALTH OR THE ENVIRONMENT, AND STATUTORYAND REGULATORY AUTHORITIES

The conditions remaining at the Blissfield Cannery Site present a substantial threat to the public health or welfare, and the environment, and meet the criteria for a time-critical removal action as provided for in the NCP, 40 CFR 300.415(b)(2). These criteria include, but are not limited to, the following:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

During the site assessment, numerous steel and poly drums and hundreds of small containers were observed, some in poor condition with no secondary containment. Several samples were collected (eight liquid and three soil samples)

from the Site. Liquid samples contained chromium; 1,4-dichlorobenzene; and chlorobenzene at concentrations exceeding the 40 CFR 261.2 criteria. Therefore, these samples represent hazardous wastes by virtue of the characteristic of toxicity. In addition, one liquid sample exhibited a pH level of less than 2 SUs, and five liquid samples exhibited pH levels exceeding 12.5 SUs. These samples represent hazardous wastes by virtue of the characteristic of corrosivity. One soil sample contained total arsenic at a concentration exceeding the MDEQ Part 201 Non-Residential Soil Direct Contact criterion for arsenic. Therefore, the soil associated with this sample represents a direct-contact risk.

The Site is currently unrestricted, with no perimeter fencing or barriers in place to deter trespassers or animals from entering the Site. During the site assessment, animal tracks were observed at several locations throughout the Site and an individual scraping metal was also observed. Unrestricted access to the Site could result in an accidental or intentional release of hazardous materials and further expose animal populations to on-site hazards.

The Site is located in rural mixed residential, commercial, and agricultural area, with residential properties located along the western Site boundary. The ESA (Phase I and II) indicates that the on-site retention ponds formerly were used for wastewater discharge during canning operations. Although drains and discharge pipes to the ponds were not observed in the on-site buildings during the site assessment, they may exist and provide a contamination migration route or a source of contaminant exposure to animals.

The close proximity of residences and other vulnerable areas (farmland) observed during the site assessment greatly increases the likelihood of impacts to the public health or welfare of the United States or the environment if exposure or a release occurs. Threats associated with Chlorobenzene, Arsenic and Chromium includes:

Chlorobenzene - Chlorobenzene is used primarily as a solvent, a degreasing agent, and a chemical intermediate. Limited information is available on the acute (short-term) effects of chlorobenzene. Acute inhalation exposure of animals to chlorobenzene produced narcosis, restlessness, tremors, and muscle spasms. Chronic (long-term) exposure of humans to chlorobenzene affects the central nervous system (CNS). Signs of neurotoxicity in humans include numbness, cyanosis, hyperesthesia (increased sensation), and muscle spasms. No information is available on the carcinogenic effects of chlorobenzene in humans. EPA has classified chlorobenzene as a Group D, not classifiable as to human carcinogenicity.

Chromium - Chromium is a naturally occurring element; however, hexavalent chromium is generally produced by industrial processes such as chrome plating and finishing. The health effects of exposure to trivalent and hexavalent chromium has been researched and is well documented. Existing information about chromium, especially hexavalent chromium, is mainly related to worker exposure. Plating industry workers and workers in other industries

utilizing chromium are most susceptible to toxic levels. Hexavalent and trivalent chromium can be toxic at high levels; however, hexavalent chromium is the most toxic. Chromium is also listed under D007 as a hazardous waste. According to the National Institute of Occupational Safety and Health (NIOSH), the immediately dangerous to life and health (IDLH) level for chromium is 250 micrograms per cubic meter (mg/m3).

Arsenic- Arsenic is a naturally occurring element widely distributed in the earth's crust. In the environment, arsenic is combined with oxygen, chlorine, and sulfur to form inorganic arsenic compounds. Arsenic in animals and plants combines with carbon and hydrogen to form organic arsenic compounds. Breathing high levels of inorganic arsenic can give you a sore throat or irritated lungs. Ingesting very high levels of arsenic can result in death. Exposure to lower levels can cause nausea and vomiting, decreased production of red and white blood cells, abnormal heart rhythm, damage to blood vessels, and a sensation of "pins and needles" in hands and feet. Ingesting or breathing low levels of inorganic arsenic for a long time can cause a darkening of the skin and the appearance of small "corns" or "warts" on the palms, soles, and torso. Skin contact with inorganic arsenic may cause redness and swelling. Almost nothing is known regarding health effects of organic arsenic compounds in humans. Studies in animals show that some simple organic arsenic compounds are less toxic than inorganic forms. Ingestion of methyl and dimethyl compounds can cause diarrhea and damage to the kidneys.

Actual or potential contamination of drinking water supplies or sensitive ecosystems;

During the site assessment, numerous steel and poly drums and hundreds of small containers were observed, some in poor condition with no secondary containment; indicating a high likelihood for further contaminant releases from the Site. In the area residents depend on freshwater wells as a source of drinking water. In addition, the River Raisin is located 0.5 mile west of the Site.

Pollutants that enter groundwater or bodies of surface water can be retained for long periods of time and negatively impact water supplies and sensitive ecosystems that may have been established since the shut-down of Site operations.

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;

Eight liquid samples were collected from on-site drums. As discussed above, sample results indicate that some liquid samples represent hazardous wastes by virtue of the characteristics of toxicity and corrosivity.

During the site assessment, numerous drums, containers, and an

aboveground storage tank were observed at the Site. Some of the drums showed signs of deterioration, including weathered steel and poly exteriors and bungs. Some of the containers had missing lids and open tops. Further deterioration of the drums and containers may allow hazardous substances to migrate into the environment and off-Site.

High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate;

During the site assessment, three soil samples were collected in attempt to replicate sampling locations where arsenic results exceeded the MDEQ RBSLs for residential soil during a June 2010 BEA. One of the three samples collected from 0 to 2 feet below ground surface (bgs) contained nearly twice the allowable limit for arsenic set forth by the MDEQ Part 201 Non-Residential Direct Contact criterion. The lack of perimeter fencing or barriers around the Site allows the general public and animal populations to enter the Site and come in contact with contaminated soil

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

The county of Lenawee, Michigan, receives approximately 31 to 33 inches of precipitation annually, with rainfall and snowfall fairly evenly distributed throughout the year. Weather conditions will continue to contribute to the deterioration of Site buildings and on-Site containers and drums, increasing the potential for migration of hazardous constituents off-Site. In addition, the roof in several areas of the two former cannery buildings has collapsed or is completely missing.

Threat of fire or explosion;

The threat of fire or explosion at the Site is moderate based on the materials stored at the Site and on signs of trespassing observed during the site assessment. If a fire or explosion occurs at the Site, it could produce toxic gases, irritants, smoke, and contaminated fire-water runoff. During the site assessment, numerous types of flammable automotive cleaners, fuels, and solvents (such as aerosol brake cleaner and WD40) as well as flammable wood refinishing solvents (such as turpentine and paint stripper) were observed in on-site drums and containers. The lack of perimeter fencing, barriers, and exterior building doors throughout the Site would allow trespassers to enter the Site and deliberately or accidentally start a fire.

The availability of other appropriate federal or state response mechanisms to respond to the release;

Lenawee County and the City of Blissfield requested assistance from EPA to perform a site assessment and cleanup activities. This request documents the

need for federal involvement to address imminent endangerment to the public health or welfare of the United States or the environment posed by the Site.

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the known and suspected hazardous substances on Site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The response actions described in this memorandum directly address actual or potential releases of hazardous substances on Site, which may pose an imminent and substantial endangerment to public health, or welfare, or the environment. Removal activities on Site will include:

1) Develop and implement a Site Health and Safety Plan and Site Security Plan;

2) Collect, sample and characterize the contents of the various drums and containers;

3) Collect, characterize, and properly dispose of the various laboratory chemicals;

4) Collect, sample and characterize the contaminated soils in various locations on-Site;

5) Bulk similar waste streams from drums, containers, totes, and transformers, and transport and properly dispose of the containerized waste; and

6) Decontaminate containers, floors, vats, tanks, and heavy equipment as necessary, and appropriately dispose of decon-water.

7) Transport and dispose of all building and demolition debris at a RCRA/CERCLA-approved disposal facility in accordance with EPA's Off-Site Rule (40 CFR § 300.440).

8) Take any other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the EPA OSC determines may pose an imminent and substantial endangerment to the public health or the

environment.

The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal Site control consistent with the provisions of Section 300.415(l) of the NCP. Elimination of all threats presented by hazardous substances in the buildings is, however, expected to minimize the need for post-removal Site control.

Off-Site Rule

All hazardous substances, pollutants, or contaminants removed off-site pursuant to this removal action for treatment, storage, and disposal shall be treated, stored, or disposed of at a facility in compliance, as determined by EPA, with the EPA Off-Site Rule, 40 C.F.R. § 300.440.

2. Contribution to remedial performance:

The proposed action will not impede future actions based on available information.

3. Engineering Evaluation/Cost Analysis (EE/CA)

Not Applicable

4. Applicable or relevant and appropriate requirements (ARARs)

All applicable, relevant, and appropriate requirements (ARARs) of Federal and State law will be complied with to the extent practicable considering the exigencies of the circumstances.

On July 18, 2011, a letter was sent to Mr. Mitch Adelman at MDEQ asking for any State of Michigan ARARs which may apply.

5. Project Schedule

The removal activities are expected to take 14 on-Site working days to complete.

B. Estimated Costs

The detailed cleanup contractor cost is presented in Attachment 2 and the Independent Government Cost Estimate is presented in Attachment 3. Estimated project costs are summarized below:

REMOVAL ACTION PROJECT CEILING ESTIMATE	
Extramural Costs:	
Regional Removal Allowance Costs:	
Total Cleanup Contractor Costs (This cost category includes estimates for ERRS, subcontractors, Notices to Proceed, and Interagency Agreements with Other Federal Agencies. Includes a 15% contingency)	$203,369
Other Extramural Costs Not Funded from the Regional Allowance:	
Total START, including multiplier costs	$32,722
Subtotal Extramural Costs	$236,091
Extramural Costs Contingency (20% of Subtotal, Extramural Costs rounded to nearest thousand)	$ 47,218
TOTAL REMOVAL ACTION PROJECT CEILING	**$283,309**

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants at the Site which may pose an imminent and substantial endangerment to public health and safety and the environment. These response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Given the Site conditions, the nature of the hazardous substances and pollutants or contaminants documented on Site, and the potential exposure pathways to nearby populations described in Sections II, III and IV above, actual or threatened release of hazardous substances and pollutants or contaminants from the Site, failing to take or delaying action may present an imminent and substantial endangerment to public health, welfare or the environment, increasing the potential that hazardous substances will be released, thereby threatening the adjacent population and the environment.

VII. OUTSTANDING POLICY ISSUES

None

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

The total U.S. EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be $493,213.[1]

($283,309+ $19,722) + (62.76% x $303,031) = $493,213

IX. RECOMMENDATION

This decision document represents the selected removal action for the Blissfield Cannery Site located at 440 East Jefferson, Blissfield, Lenawee County, Michigan. It was developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based upon the Administrative Record for the Site (Attachment 4). Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal and I recommend your approval of the proposed removal action.

The total removal action project ceiling if approved will be $283,309. Of this, an estimated $250,587 may be used for cleanup contractor costs. You may indicate your decision by signing below.

APPROVE: _____ DATE: 9/1/2011
Director, Superfund Division

DISAPPROVE: _____ DATE: _____
Director, Superfund Division

[1] Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

Enforcement Addendum

Figures:

1 Site Location Map
2 Site Diagram
3 Photo Log

Attachments

1. Environmental Justice Analysis
2. Detailed Cleanup Contractor Cost Estimate
3. Independent Government Cost Estimate
4. Administrative Record Index

cc: S. Fielding, U.S. EPA 5104A
M. Chezik, U.S. Department of Interior, w/o Enf. Addendum, michael_chezik@ios.doi.gov
J. Sygo, MDEQ, sygoj@michigan.gov
P. Schrantz, MDEQ, schrantzp@michigan.gov

BCC PAGE

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ENFORCEMENT CONFIDENTIAL ADDENDUM

BLISSFIELD CANNERY SITE
BLISSFIELD, LENAWEE COUNTY, MICHIGAN

AUGUST 2011

(REDACTED 2 PAGES)

ENFORCEMENT CONFIDENTIAL
NOT SUBJECT TO DISCOVERY

FIGURES

FIGURE 1

SITE LAYOUT MAP

FIGURE-2
SITE DIAGRAM

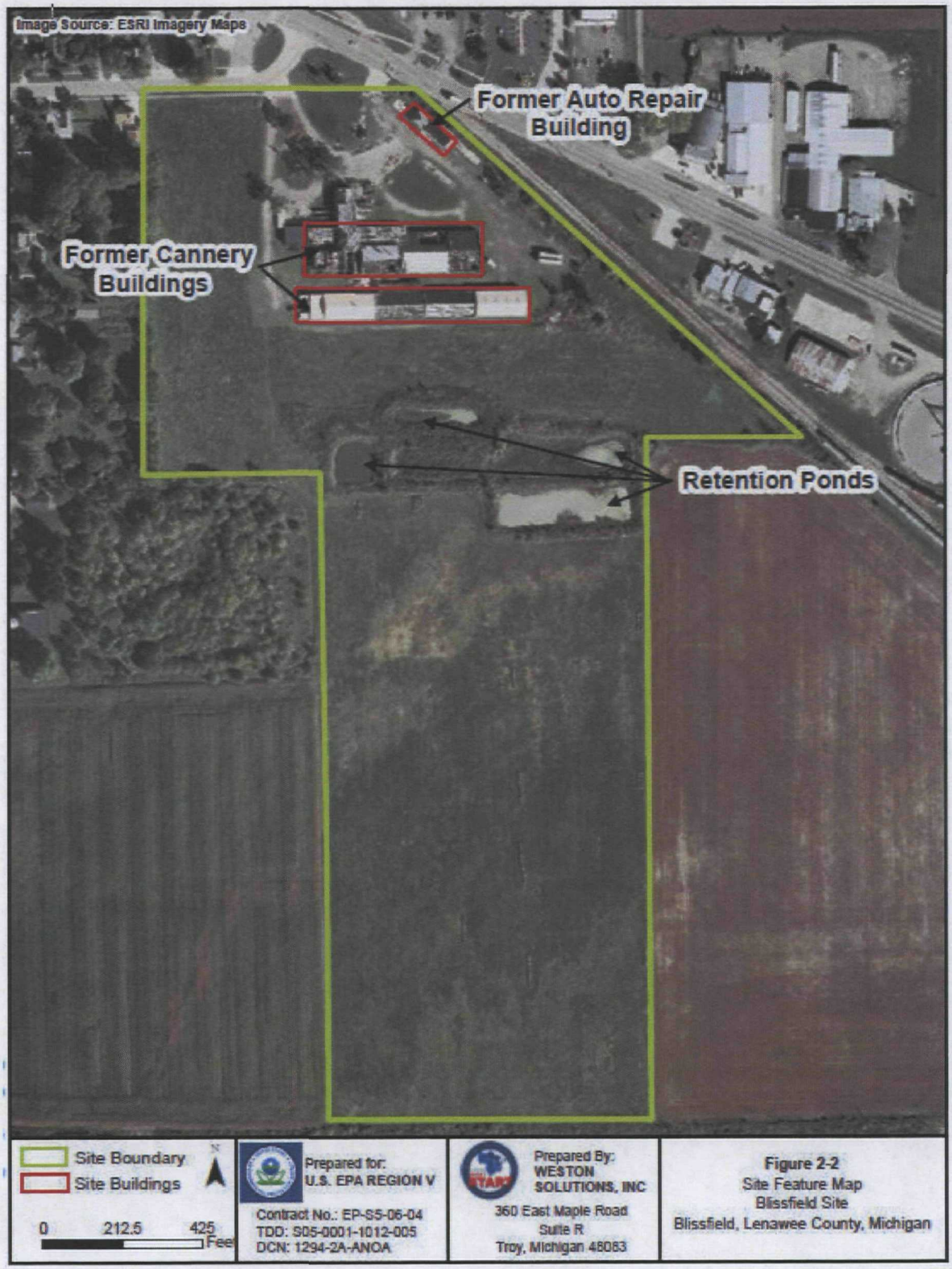
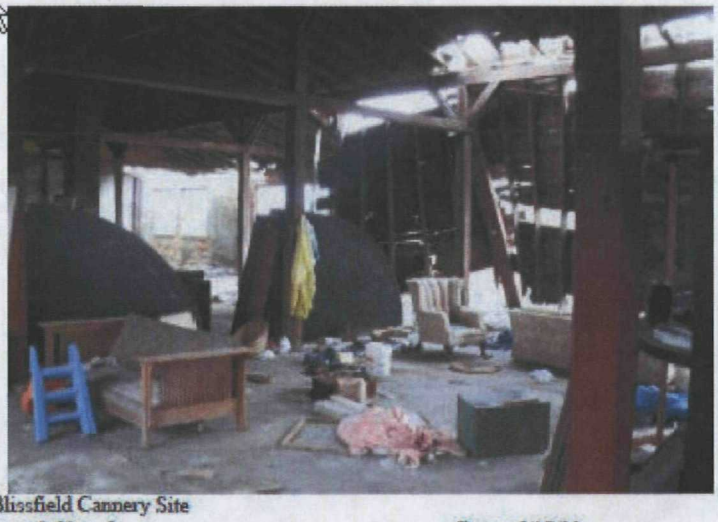


FIGURE-3
PHOTO LOG

Site: Blissfield Cannery Site
Photograph No.: 1
Direction: Southwest
Subject: Northern cannery building
Date: 5/17/11
Photographer: Matthew Beer



Site: Blissfield Cannery Site
Photograph No.: 3
Direction: Southeast
Subject: Collapsed roof in southern cannery building
Date: 5/17/11
Photographer: Matthew Beer

Site: Blissfield Cannery Site
Photograph No.: 17 **Date:** 5/17/11
Direction: Down **Photographer:** Matthew Beer
Subject: Small containers of film processing and laboratory chemicals collected from southern cannery building

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Site: Blissfield Cannery Site
Photograph No.: 18 **Date:** 5/17/11
Direction: Down **Photographer:** Matthew Beer
Subject: Small containers stored outside of northern cannery building

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ATTACHMENTS

ATTACHMENT 1

Environmental Justice Analysis
Blissfield Cannery Site
Blissfield, MI
August 2011

The area surrounding the Blissfield Cannery Site was screened for Environmental Justice (EJ) concerns using Region 5's EJ assist Tool (which applies the interim version of the national EJ strategic Enforcement Assessment Tool (EJSEAT)). Census tracts with a score of 1, 2, or 3 are considered to be high-priority potential EJ areas of concern according to EPA Region 5. The Blissfield Cannery Site is in a census tract with a score of 8. Therefore, Region 5 does not consider this to be a high-priority potential EJ area of concern.

Blissfield Cannery Site Map Showing EJ SEAT Values For Surrounding Area

ATTACHMENT 2

DETAILED CLEANUP CONTRACTOR AND START ESTIMATE

BLISSFIELD CANNERY SITE
BLISSFIELD, LENAWEE COUNTY, MICHIGAN

AUGUST 2011

(REDACTED 1 PAGE)

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ATTACHMENT 3

INDEPENDENT GOVERNMENT COST ESTIMATE

BLISSFIELD CANNERY SITE
BLISSFIELD, LENAWEE COUNTY, MICHIGAN

AUGUST 2011

(REDACTED 3 PAGES)

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ATTACHMENT 4

ADMINISTRATIVE RECORD
FOR
BLISSFIELD CANNERY SITE
BLISSFIELD, LENAWEE COUNTY, MICHIGAN
AUGUST 2011

DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
8/6/10	Soil and Materials Engineers, Inc.	Village of Blissfield	Baseline Environmental Assessment	736
8/6/10	J. Wonacott, Village of Blissfield	MDEQ	MDEQ Notice Regarding Discarded or Abandoned Containers	8
6/20/11	Weston Solutions	J. Gulch, EPA	Site Assessment Report for the Blissfield Cannery Site	88
7/19/11	J. Gulch, EPA	M. Adelman, MDEQ	ARAR Letter	1
xx/xx/11	J. Gulch, EPA	R. Karl, EPA	Action Memorandum	xx